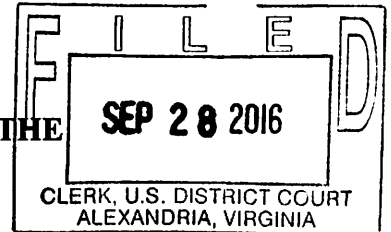


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	Criminal No. 1:16-CR-214
)	
)	
v.)	
)	
)	COUNTS 1-4:
DIONNE CASTRO,)	18 U.S.C. § 1343 (Wire Fraud)
a.k.a.)	
Trinity Castro,)	
)	
Defendant.)	FORFEITURE VIOLATIONS:
)	21 U.S.C. § 853(p);
)	18 U.S.C. § 981(a); & 28 U.S.C. § 2461(c)

INDICTMENT

September 2016 Term – At Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

Introduction

1. Defendant DIONNE CASTRO was employed as the office manager of Law Firm A, a law firm with an office located in the City of Alexandria, Virginia, within the Eastern District of Virginia. Among her other duties, defendant CASTRO was solely responsible for payroll administration and bank statement reconciliation, including submitting payroll requests to Law Firm A's account at Bank A. She was similarly responsible for the firm's accounting books and records and made internal entries in the firm's QuickBooks accounting software.

2. Law Firm A paid its employees bi-weekly and processed payroll expenses from its business bank account directly to its employees' accounts via Automated Clearing House

("ACH") payments. These payments were made from Law Firm A's office through its business bank account at Bank A, both of which were located in Alexandria, Virginia.

3. Bank A used the Fedwire Funds Service system to process all ACH transactions. ACH is a payment method used to route money from one bank account to another. The ACH process is operated by The Federal Reserve Bank. The Fedwire Funds Service is a real-time gross settlement system that enables participants to initiate funds transfers that are immediate, final, and irrevocable once processed. Participants originate funds transfers by instructing a Federal Reserve Bank to debit funds from its own account and credit funds to the account of another participant.

4. Following the processing of each payroll, Law Firm A's QuickBooks accounting software generated a computer file recording the transaction details. These files were saved on defendant CASTRO's computer at the offices of Law Firm A.

5. Defendant CASTRO had personal accounts at SunTrust Bank, located in Orlando, Florida, and PNC Bank, located in Pittsburgh, Pennsylvania.

COUNTS ONE THROUGH FOUR

6. Beginning in or about 2009, and continuing to in or about October 2011, within the Eastern District of Virginia and elsewhere, defendant CASTRO devised and intended to devise and aided and abetted a scheme to defraud Law Firm A, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, from Law Firm A by causing money to which she was not entitled to be sent to her personal bank accounts from Law Firm A's bank account.

Purpose of the Scheme to Defraud

7. It was a purpose of the scheme to defraud that defendant CASTRO submitted fraudulent payroll requests to Law Firm A's account at Bank A, caused funds to be dispersed by Law Firm A's account at Bank A to defendant CASTRO's bank accounts in Florida and Pennsylvania, and thereafter falsified Law Firm A's QuickBooks accounting records to conceal her fraud and embezzlement, thereby enriching herself.

Manner and Means

8. Paragraphs 1 through 7 of this Indictment are re-alleged and incorporated as if fully set forth herein.

9. On or about the dates listed below, in the Eastern District of Virginia and elsewhere, defendant CASTRO for the purpose of executing and attempting to execute and aiding and abetting the execution of the above-described scheme to defraud and obtaining money and property by materially false and fraudulent pretenses, representations, and promises, did cause to be transmitted by means of wire communication in interstate commerce certain writings, signals, and sounds, that is, payment instructions to Law Firm A's bank account, as further described below:

Count	Date (On or About)	Description of Electronic Transmission
One	9/28/2011	ACH payment instruction to debit Law Firm A's account in Virginia and credit CASTRO's PNC account in Pennsylvania in the amount of \$1,742.85
Two	9/30/2011	ACH payment instruction to debit Law Firm A's account in Virginia and credit CASTRO's SunTrust account in Florida in the amount of \$2,000
Three	10/7/2011	ACH payment instruction to debit Law Firm A's account in Virginia and credit CASTRO's SunTrust account in Florida in the amount of \$1,742.83
Four	10/12/2011	ACH payment instruction to debit Law Firm A's account in Virginia and credit CASTRO's SunTrust account in Florida in the amount of \$1,681.58

(Wire Fraud, in violation of Title 18, United States Code, Section 1343)

FORFEITURE ALLEGATIONS

1. Upon conviction of the offense alleged in Counts One – Four, the Defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to this offense, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). The United States will also seek a forfeiture money judgment against the defendant in the amount of \$322,720.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

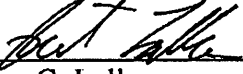
the Defendant shall forfeit to the United States any other property of the Defendant, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p))

A TRUE BILL:
Pursuant to the Government Act,
the original of this page has been filed
under seal at the Clerk's Office.

FOREPERSON

CHANNING D. PHILLIPS
UNITED STATES ATTORNEY

By: 
Peter C. Lallas
Assistant United States Attorney
Special Attorney to the Attorney General